

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

2014 JAN 22 A 11: 27

Plaintiff,

JON A. ...
CLERK

Case No. 14-CR-

14 - CR009

v.

LUCKY L. CHARLESTON,
CLEMMIE L. CARTER,
SAMUEL H. MCGEE, and
YOLANDA K. BARNES,[18 U.S.C. §§ 924(c), 922(g)(1),
2113(a) and (d), and 21 U.S.C. §§
841(a)(1) and (b)(1)(C)]

Defendants.

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about December 27, 2013, in the State and Eastern District of Wisconsin,

LUCKY L. CHARLESTON,
CLEMMIE L. CARTER,
SAMUEL H. MCGEE, and
YOLANDA K. BARNES

by force, violence, and intimidation did take from the person and presence of another, approximately \$15,000 in money belonging to and in the care, custody, control, management, and possession of the BMO Harris Bank, Black Creek, Wisconsin, a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and in committing such offense, the defendants did assault and put in jeopardy the life of another person by the use of a dangerous weapon, that is a firearm.

All in violation of Title 18, United States Code, Sections 2113(a) and (d) and 2.

COUNT TWO**THE GRAND JURY FURTHER CHARGES:**

On or about December 27, 2013, in the State and Eastern District of Wisconsin,

**LUCKY L. CHARLESTON,
CLEMMIE L. CARTER, and
SAMUEL H. MCGEE**

knowingly used, carried, and brandished a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the offense of bank robbery charged in Count One of this indictment, and did possess the firearm in furtherance of such crime.

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES:

On December 27, 2013, in the State and Eastern District of Wisconsin,

SAMUEL H. MCGEE

knowingly and intentionally possessed with the intent to distribute a mixture and substance containing heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT FOUR**THE GRAND JURY FURTHER CHARGES:**

On December 27, 2013, in the State and Eastern District of Wisconsin,

CLEMMIE L. CARTER,

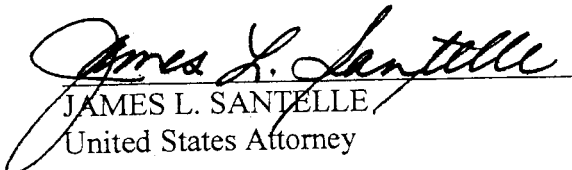
having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, to-wit: a Glock 31, .357 handgun, serial number FNV189, which had prior to his possession been transported in interstate commerce, and the possession of which was therefore in and affecting commerce.

In violation of Title 18, United States Code, Section 922(g)(1).

A TRUE BILL:


FOREPERSON

Dated: 1-22-2014


JAMES L. SANTELLE
United States Attorney